



United States  
Department of  
Agriculture

Food and  
Nutrition  
Service

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DATE: August 31, 2015

MEMO CODE: SP 43-2015

SUBJECT: Administrative Review – Revised Manual, Tools, and Forms

TO: Regional Directors  
Special Nutrition Programs  
All Regions

State Directors  
Child Nutrition Programs  
All States

This memorandum provides information on the updated School Meal Programs Administrative Review Manual, and accompanying tools, forms and instructions for School Year (SY) 2015-2016. While the concepts of the review remain the same, the Manual, along with several tools, forms, and instructions, have been edited to incorporate new requirements and provide clarity and understanding. The edits are highlighted in yellow in the Manual and in the related tools, forms, and instructions. The attached Table: SY 2015-2016 Updated Administrative Review Manual, Tools, and Forms, identifies the areas with key changes, but is not all encompassing. Please refer to the Food and Nutrition Service (FNS) PartnerWeb for the most current versions and updates of the SY 2015-2016 Manual, tools and forms.

A module to assess compliance with new regulations, Professional Standards, is also included. State agencies are required to ensure that School Food Authorities (SFA) are in compliance with hiring standards for new school nutrition program directors hired on or after July 1, 2015 at the SFA level and that the annual training standards for all school nutrition program directors, managers, and staff are in line with the requirements established in 7 CFR 210.30. No fiscal action will be associated with noncompliance; however, State agencies must provide technical assistance to support schools in meeting hiring and training requirements.

As a reminder, a module was added last year to assess compliance with the *Smart Snacks in School* regulations. State agencies are required to identify the entities responsible for selling foods/beverages to students, and to ensure that food and beverages sold meet the minimum requirements established in 7 CFR 210.11. No fiscal action will be associated with noncompliance; however, State agencies must provide technical assistance to support schools in providing a healthy school environment.

#### Using Updated Tools and Forms for SY 15-16 Reviews:

State agencies are expected to start implementing the updates reflected in the SY 2015-2016 Administrative Review Manual, tools, forms and instructions as soon as possible. If any State agency has already begun the Administrative Review process using SY 2014-2015 versions of Administrative Review materials, especially the requirements to complete the Resource Management Risk Indicator Tool four weeks in advance, FNS expects that these State agencies will transition to using the SY 2015-2016 updated forms and tools for reviews commencing on or after November 1, 2015. If an Administrative Review is in process prior to November 1, the State agency may use the forms and tools that the Administrative Review was started with through the reviews completion. State agency use of the Administrative Review materials will be evaluated during management evaluations. State agencies that anticipate being unable to meet the deadline should contact their Regional Office.

#### Procurement Review:

State agencies are reminded that while the review of procurement practices is required, given the complexity of the procurement process and the need for ongoing technical assistance in procurement, SAs have the discretion to incorporate this review as an addition to the Administrative Review process or through a separate review process. SAs must address compliance with procurement requirements in 7 CFR Parts 210.21, 3016.36 and 3019.40-48, as applicable, and OMB Circulars, or 2 CFR Part 200, if already adopted. FNS is working to develop a Local Agency Procurement Review Tool for State agencies to aid in this monitoring. This tool will be tested and training will be conducted in SY 2015-2016 for implementation by State agencies in SY 2016-2017, if adopted.

#### Technical Assistance and Corrective Action for Repeated Violations Regarding Meal Pattern Quantities, Types, and Dietary Specifications:

In the first three year Administrative Review cycle (SY 2013-14 through SY 2015-16) there will be no repeated violations or fiscal action in the area of vegetable subgroups, milk types, food quantities, whole grain-rich foods, and dietary specifications. The SA must document findings associated with the SFA's challenges in implementing the meal patterns observed by the State agency as well as any technical assistance and corrective action.

#### SY 2014-2015 640 Reporting:

Due to the new process of reviewing programs through the Administrative Review an updated manner in which to report the information that is collected on the FNS-640 is needed to ensure that meaningful information and data is collected. FNS is continuing our efforts to make sure we have a reporting procedure that reflects the updated review process. In lieu of collecting the FNS-640 from State agencies that have implemented the Administrative Review process, once again this year FNS will request two complete sets of Administrative Review forms, tools, and workbooks from each State agency from SY 2014-2015. Additional information and instructions will be forthcoming.

State agencies should direct any questions concerning this guidance to the appropriate FNS Regional Office.

Sincerely,

**Original Signed**

Sarah E. Smith Holmes  
Director  
Program Monitoring and Operational Support

Attachment

**Table: SY2015-2016 Updated Administrative Review Manual, Forms and Tools**

<b>Administrative Review Manual, Forms and Tools</b>	<b>Summary of Update</b>
Off-site Assessment Tool	Questions edited, combined and deleted for clarity.
On-site Assessment Tool	Questions edited, combined and deleted for clarity.
Dietary Specifications Assessment Tool Questions 11,12&16	<ul style="list-style-type: none"><li>• Not Applicable (NA) option was added.</li></ul>
Professional Standards Module	<ul style="list-style-type: none"><li>• New module added - General Area of Review.</li><li>• State agencies will:<ul style="list-style-type: none"><li>◦ Ensure School Food Authorities comply with Professional Standards and retain documentation demonstrating compliance per 7 CFR Part 210.30.</li></ul></li></ul>
Resource Management (RM) Section, RM Risk Indicator Tool, and RM Comprehensive Review Form	<ul style="list-style-type: none"><li>• Streamlined and clarified questions in the Off-site Assessment and RM Risk Indicator Tools</li><li>• Provided additional questions and information regarding the review of the Paid Lunch Equity and Revenue from Nonprogram Foods areas on the RM Risk Indicator Tool</li><li>• Updated the RM Comprehensive Review Form to reflect updates.</li></ul>
Certification and Benefit Issuance Module	<ul style="list-style-type: none"><li>• New instructions added pertaining to updated policies and in regards to base year reviews taking place through the Administrative Review.</li></ul>
Supplemental Afterschool Snack Program Administrative Review Form	Information added for clarity and reformatted to be in line with other Administrative Review forms.
Supplemental Special Milk Program Administrative Review Form	Updated reporting numbers.
Special Provision Options Section	The Manual now contains a Special Provision Options 1-3 Module and a separate Community Eligibility Provision Module
Fiscal Action Module and Fiscal Action Workbook	<ul style="list-style-type: none"><li>• Fixed formula on SBP P2/CEP tab.</li><li>• Instructions added in regards to eligibility determination errors when</li></ul>

	<p>only errors from reduced-price category to the free category have occurred.</p> <ul style="list-style-type: none"> <li>• Instructions added regarding the use of partial recalculation in the Supplemental Afterschool Snack or Special Milk Programs when a recalculation is required.</li> </ul>
Placeholder for School Meal Environment Module	<p>The placeholder for the School Meal Environment has been moved from its own module to the Local School Wellness Module in order to add a Module on Professional Standards. No additional review activity on the School Meal Environment is needed until final regulations are issued.</p>